

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
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: (Jointly Administered)
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**VERIFIED STATEMENT OF THE SERVICE EMPLOYEES INTERNATIONAL
UNION PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

The Service Employees International Union (“SEIU”) states as follows:

1. Rule 2019 of the Federal Rules of Bankruptcy Procedure does not require the filing of a statement by SEIU. *See, e.g., In re Blue Diamond Coal Co.*, 147 B.R. 720, 727 (Bankr. E.D. Tenn. 1992) (labor union’s compliance with Rule 2019 “not required”), *aff’d* 160 B.R. 574 (E.D. Tenn 1993). Nonetheless, out of an abundance of caution, SEIU files this *Verified Statement of the Service Employees International Union Pursuant to Federal Rule of Bankruptcy Procedure 2019* (“Statement”). By doing so, SEIU does not waive, and it expressly reserves, its position that the Statement is not required.

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

2. SEIU is an international labor union, formed in 1921, that represents approximately two million public-sector and private-sector employees in the United States and its territories and in Canada.

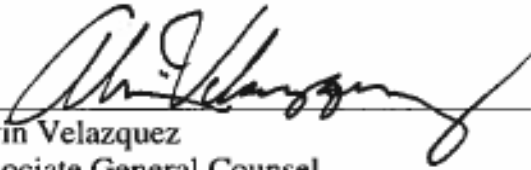
3. SEIU is acting in these Title III proceedings on behalf of its two affiliated locals in Puerto Rico, SEIU Local 1996/Sindicato Puertoriqueno de Trabajadores y Trabajadores and SEIU Local 1199/Union General de Trabajadores. These two SEIU affiliates serve as collective bargaining representatives for approximately 25,000 employees of the Commonwealth of Puerto Rico and its instrumentalities. These affiliates are party to collective bargaining agreements (“CBA’s”) governing terms and conditions of employment of SEIU’s members in Puerto Rico.

4. SEIU filed a proof of claim in these proceedings dated May 25, 2018. This Statement incorporates by reference that proof of claim. As the proof of claim states, SEIU has contingent and non-contingent, liquidated and unliquidated claims based on pay, benefits and other terms of employment owing to SEIU members under the CBA’s, including but not limited to pay and benefits owed under resolved but unpaid pre-petition grievance settlements and arbitration awards. SEIU also has contingent, unliquidated claims for pension and other post-employment benefits accrued by SEIU members as a result of their employment with the Commonwealth and/or its instrumentalities and as a result of their participation in the Employee Retirement System (“ERS”). These pension claims include the portion of ERS’s total actuarial liability -- which total as of June 30, 2016 was approximately \$36 billion -- that is attributable to the accrued benefits earned by SEIU members employed by the Commonwealth and its instrumentalities

5. SEIU reserves the right to amend this Statement.

6. The undersigned, Alvin Velazquez, Associate General Counsel of SEIU, hereby verifies that this Statement is true and accurate to the best of his knowledge, information, and belief.

Executed this 9th day of May 2019
Washington D.C.



Alvin Velazquez
Associate General Counsel
Service Employees International Union
1800 Massachusetts Avenue, NW
Washington, DC 20036

Dated: May 9, 2018

Respectfully submitted,

/s/ *Peter D. DeChiara*

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Attorneys for Service Employees International
Union

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of May 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Court-approved Case Management Procedures in this case.

Dated: May 9, 2018

/s/ Marie B. Hahn
Marie B. Hahn